



Family Services and Labour
Early Learning and Child Care

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Services à la famille et Travail

Apprentissage et garde des jeunes enfants

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April 5, 2013

Dear Centre Director:

As you will recall, a letter was sent to you on July 4, 2012 to advise of proposed federal legislation changes that would ban drop-side cribs. In addition, the letter outlined the need to provide direct supervision to infants during nap time. The purpose of this letter is to update you and provide additional information to assist your centre in meeting the requirement for the supervision of napping infants.

Sleeping Surfaces, Health Canada

As an update to the above-referenced letter of July 4, 2012 regarding the proposed federal changes to the *Cribs, Cradles and Bassinets Regulations* banning the use of drop-side cribs, please be advised that the federal changes have not yet been passed. We have been advised by Health Canada that the changes are in the early stages of the federal regulatory process. We will write to you when we have more definitive information.

As you may also recall in the July 4, 2012 letter, in addition to the proposed changes to cribs, Health Canada recommends that playpens not be used as sleeping surfaces for unattended infants. Therefore, in the interim, if sleeping equipment is to be replaced, we strongly recommend that playpens and drop-side cribs not be purchased. It is also strongly recommended that Canadian products (or products from a Canadian supplier) be purchased as requirements are not the same in the United States and Canada.

Supervising Infants at Nap Time

During this past re-licensing period, child care coordinators have worked with centres in assessing their current napping arrangements. Some centres have modified their space or staff schedules to meet the direct supervision requirement, and we commend their efforts in doing so. As you are aware, Manitoba Regulation 62/86 requires children to be supervised at all times. We recognize that over time various practices of supervision for sleeping infants have been approved, including indirect supervision with no visual checks at all; at the same time, we have always required direct supervision for older preschool children.

While we encourage centres to continue to work toward providing direct supervision of sleeping infants at all times, we acknowledge that some centres have faced challenges and, as a result, have requested clarification regarding the minimum acceptable requirements. As such, the following is provided:

- (1) New (future) infant centres will need to be designed to ensure direct supervision of infants during nap time.
- (2) Existing centres with a separate nap room immediately adjacent to the main play room not able to provide direct supervision at all times shall meet the following minimum requirements:

- Direct and visual checks on the napping infant/s a minimum of once every 10 minutes (and document the checks).
- Positioning staff in the near vicinity of the nap room so that staff are able to immediately respond to the infant as needed.
- If there is a window from the play room to the nap room, leaving the window uncovered to allow visibility into the nap room.
- If there is no window from the play room to the nap room, leaving the door open when staff are not in the nap room.
- Providing sufficient light in the nap room to see napping infants' skin colour and breathing.
- Using a monitor within hearing distance so that staff can quickly respond to infants.

These minimum requirements will help ensure a basic level of safety for infants in centres unable to provide direct supervision at all times, including those still using drop-side cribs and/or playpens. In addition to these minimum requirements, centres are strongly encouraged to implement additional efforts to see, hear and respond to infants during nap time, such as: remaining in the nap room whenever there are 4 or more infants napping, having staff in the nap room when additional staff are available, using a portable monitor clipped to staff to hear infants, and using a timer as a reminder to staff to check infants at least every 10 minutes.

Please note the following exception to the above minimum requirements:

- When an infant under six months of age sleeps in a play pen or drop-side crib, direct supervision shall be provided at all times. Your child care coordinator is available to assist in exploring options for meeting this requirement.

In addition, it would be prudent to directly supervise these infants (under six months of age) upon enrolment, for a period of time, regardless of the type of sleeping equipment used in order to become familiar with each infant's sleeping habits and patterns.

It is also recommended that nap time supervision information be included in your centre's parent policies.

Please be assured that we are committed to working with you to ensure the safety and well-being of infants at all times. We appreciate that the physical lay-out of each centre is unique. As such, your child care coordinator will assess your physical space and nap time supervision plan using these guidelines and work with you to meet the supervision requirements.

Thank you for your commitment to safe and quality care for children in licensed early learning and child care settings in Manitoba.

Sincerely,



Margaret Ferniuk
Director
Manitoba Early Learning and Child Care

c: Child Care Coordinators